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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

REARDEN LLC, et al.,

 Plaintiffs,

 v.
 THE WALT DISNEY COMPANY, *et al.*,

 Defendants.

No. 4:17-CV 04006-JST-SK
 No. 4:17-CV-04191-JST-SK

**DECLARATION OF ROGER VAN
 DER LAAN IN OPPOSITION TO
 DEFENDANTS' MOTION TO
 EXCLUDE PORTIONS OF
 DECLARATION OF ANGELA
 TINWELL**

REARDEN LLC, et al.,

 Plaintiffs,

 v.
 TWENTIETH CENTURY FOX FILM
 CORPORATION, *et al.*,

 Defendants.

Judge: Hon. Jon S. Tigar
 Date: To be set
 Time: To be set

Ctrm.: 6, 2nd Floor

1 I, Roger van der Laan, declare as follows:

2 1. I am currently employed by Rearden LLC as Vice President of Engineering. I have
3 personal knowledge of the facts stated in this declaration, and could testify with respect to those facts
4 under oath if called upon to do so.

5 2. I am co-inventor of MOVA[®] Contour[®] Reality Capture technology, and a co-recipient
6 of the Science and Technology Academy Award[®] for MOVA Contour. I currently hold 76 U.S.
7 Patents, of which 8 are related to the invention of MOVA Contour.

8 3. I am also Vice President of Engineering in multiple Rearden LLC companies,
9 including MOVA. A true and correct copy from MOVA's website regarding my role is attached
10 hereto as Exhibit A.

11 4. I was directly involved in using MOVA Contour to capture Brad Pitt's face in the
12 production of "The Curious Case of Benjamin Button" (released in 2008), working together with
13 Digital Domain's production staff. I was informed by Digital Domain that MOVA Contour was used
14 for the shots that showed Brad Pitt looking older, but not for shots that showed him looking younger.
15 Public information later published by Digital Domain staff stated the same.

16 5. Attached hereto as Exhibit B is a true and correct copy of an interview¹ of one of
17 Digital Domain's production staff who worked on "The Curious Case of Benjamin Button", Eric
18 Barba, in which he states [emphasis added]:

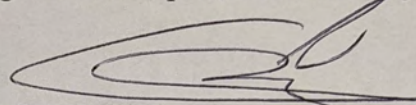
19 ... we were going to be using Brad Pitt's performance to drive *older* versions of
20 his physiology, basically re-targetting the performance to an *older* version of himself ...
21 we used the Mova rig to capture Brad's facial shapes.

22 ... for the first 52 minutes of the film [when Benjamin Button is much older than
23 Brad Pitt] it's a full 3D head, there were 325 individual shots. There's no projection,
24 there's no 2D techniques. Once our work stops about 52 minutes in [when Benjamin
25 Button is slightly older than Brad Pitt], Brad takes over in makeup. Ultimately as

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27 ¹ Seymour, Mike, "*The Curious Case of Aging Visual Effects*", fxguide, January 1, 2009,
https://www.fxguide.com/featured/the_curious_case_of_aging_visual_effects/

1 [Benjamin Button] gets younger he wears less and less makeup until it's just Brad [at his
2 actual age]. As [Benjamin Button] gets very young Lola did touchup work on [Brad
3 Pitt's] physical makeup then when he gets back to the Dance Studio Lola takes over
4 doing the younger version of Brad. Ultimately there are a couple of child actors and a
5 baby at the end.

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8 I declare that the foregoing is true and correct under penalty of perjury.
9 Executed on January 15, 2021 Signed in Lakeport, California, by:

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12 Roger van der Laan
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